

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler, District
Court Judge

Honorable Thomas Vanaskie (Ret.),
Special Discovery Master

**[PROPOSED] ORDER
GRANTING MOTION TO
STRIKE**

THIS MATTER having come before the Court upon the ZHP Parties' Motion to Strike Plaintiffs' Motion for Sanctions for Failure to Comply with Fed. R. Civ. P. 37(a)(1) & 37(d)(1)(B), on notice to liaison counsel for Plaintiffs, and the Court having considered the parties' submissions; and for good cause shown:

It is, on this _____ day of _____ 2021,

ORDERED AND ADJUDGED that that the ZHP Parties' Motion to Strike Plaintiffs' Motion for Sanctions is **GRANTED IN FULL** and the Clerk of Court is directed to strike Plaintiffs' Motion for Sanctions for Defendant ZHP's Obstruction and Failure to Provide Responsive Deposition Testimony from the docket.

Honorable Thomas I. Vanaskie,
Special Master